

PACIFIC NUTRITION-CONSULTING

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October 10, 2002

Kim Burton, Chairperson
NOSB Materials List Committee
Washington, DC

Subject: Comments on Mineral oil as a dust control agent as petitioned to the Materials List

Dear Ms. Burton,

I am a private consulting dairy nutritionist, working mostly in California. I have worked with organic dairy farms for over 10 years and work with nearly 1,000 dairy cows under certified-organic production.

I am submitting this letter as public comment regarding the issue of the petition for mineral oil to be allowed in the national materials list as a dust control agent.

I strongly support the inclusion of mineral oil on the national list as a dust control agent.

Dust control agents are required by both OSHA and EPA in the manufacturing of vitamin and mineral mixes in the mills where we are currently able to have our organic supplements manufactured. We cannot eliminate them. They are included in these packages in fairly small amounts, usually at one-half or one percent of the mix.

The two main common dust control agents used are mineral oil and vegetable oil. The vegetable oil used would have to be certified organic. The mills I have talked with, including the mill manufacturing our mixes currently, have told me that they do not envision enough organic mineral business to justify dedicating tank space to organic vegetable oil and believe that the product would go rancid before it was used up anyway.

The alternative would seem to be buying jugs of organic vegetable oil at a discount store and delivering it into the mixing process in those small amounts. One mill has said they would probably be willing to do that but it would be so expensive that the customer would not be willing to pay the additional cost. The current manufacturing mill has said that they would probably decide not to go that route and that they would have to cease the manufacturing of organic mixes. This method is likely to increase the risk of non-organic GMO oil being used for this purpose.

Another alternative that has been suggested is using Vitamin E as a dust control agent. I currently supply fairly high levels of Vitamin E supplementation as recommended in research from Ohio St. University showing that these high levels of Vitamin E reduce somatic cell counts and mastitis in lactating dairy cows. However, even my current levels of Vitamin E supplementation would need to be increased to satisfy the needs as a dust control agent. The result would be a huge increase in cost and a great oversupply of Vitamin E. Since large oversupply of nutrients is not allowed under the rule, I do not believe this should be permitted.

Finally, the notion that all the vitamin and mineral needs of a high producing lactating dairy cow can be provided by the regular feedstuffs, particularly from forages grown on properly fertilized ground, is not feasible. Research supporting this theory was done in the 1950's and earlier with cows producing at a much lower level than the level of milk production that cows are producing today. Typical feedstuffs cannot provide mineral and vitamin levels necessary to meet the nutrient requirements of today's lactating dairy cow. Therefore, additional supplementation is needed.

Mineral oil offers the least impact as a dust control agent of the items suggested. 1. It allows the continuing of vitamin and mineral supplementation. 2. It will not go rancid. 3. It will not result in an oversupply of any nutrients. 4. It minimizes the risk on non-organic GMO material entering the livestock food supply.

Granted mineral oil is a by-product of the petroleum industry and not a preferred material in the organic industry. However, I believe there is adequate reason for support of this material, to be allowed in the fairly small amounts needed as a dust control agent, in the national materials list.

Thank you for your time and consideration regarding this matter.

Sincerely,

Daniel G. Giacomini, MS, PAS